

**REMARKS**

This Application has been reviewed carefully in light of the Final Office Action mailed January 7, 2005 ("*Office Action*"). Claims 1-53 were pending in the Application and stand rejected. Applicants amend Claims 1, 7, 14, 20, 25, 33, 41 and 47. Applicants respectfully request reconsideration and favorable action in this case.

**Claim Rejections – 35 U.S.C. §102**

The Examiner rejects Claims 1-3, 6-8, 10, 12, 14, 15, 17-21, 24-30, 33-37, 41, 42, 44-48, and 50-53 under 35 U.S. §102(e) as being anticipated by U.S. Patent No. 5,946,634, which issued to Korpela, et al. ("*Korpela*"). To anticipate a claim, a single prior art reference must describe, either expressly or inherently, each and every element of the claim. M.P.E.P. §2131.

*Korpela* discloses that a "mobile terminal (10) has multiple alternative protocol stacks (151, 152...) which correspond to the protocols used on multiple backbone networks (30a-30c) to which the mobile terminal can obtain access through one or more radio access networks (20a-20c) with which it is in communication using a common, predetermined low level signalling protocol." (Abstract)

Applicants' Claim 1 recites: A configurable telecommunications system, comprising:

an interface device having a plurality of telephony resources and operable to maintain a local protocol database comprising a plurality of protocol modules, to identify, for each of the telephony resources, a protocol module required to process signals received by the telephony resource, to determine, for each of the identified protocol modules, whether the identified protocol module is valid in the local protocol database, to request each of the protocol modules not determined valid from a system controller, to receive the requested protocol modules from the system controller, *to bind the protocol modules to the respective telephony resource such that the telephony resource processes signaling using the respective protocol module*, and to store the requested protocol modules in the local protocol database; and

the system controller operable to maintain a system protocol database storing a plurality of master protocol modules, to receive requests from the interface device requesting selected ones of the master protocol modules, and to

communicate the requested master protocol modules from the system protocol database to the interface device.

(emphasis added). Applicants respectfully submit that *Korpela* fails to describe every element of this Claim.

The Examiner asserts that *Korpela* discloses “telephony resources (i.e., the loudspeaker, a microphone, keypad, an LCD, I/O port, a voice call, a data session, fax, videophone).” (See Part of Paper No./Mail Date 20041228, page 2) The Examiner further asserts that *Korpela* discloses a “protocol module required to process signals received by the telephony resource.” *Id.* Applicants disagree with these assertions and assert that *Korpela* does not disclose all of the elements of Applicants’ claims.

For example, Applicants submit that *Korpela* fails to describe an interface device that is operable “to bind the protocol modules to the respective telephony resource such that the telephony resource processes signaling using the respective protocol module,” as recited in Applicants’ Claim 1, as amended. Because *Korpela* does not disclose every element of Applicants’ amended Claim 1, *Korpela* cannot anticipate Applicants’ claim. Therefore, Applicants respectfully request that the Examiner reconsider and withdraw the §102 rejection of independent Claim 1 and its respective dependent claims. For reasons analogous to those discussed above with regard to Claim 1, Applicants request that the Examiner reconsider and withdraw the §102 rejections of independent Claims 7, 14, 20, 25, 33, 41, and 47 and their respective dependent claims.

#### **Claim Rejections – 35 U.S.C. §103**

The Examiner rejects Claim 13 under 35 U.S.C. §103(a) as being unpatentable over *Korpela*. Applicants respectfully traverse and submit the cited art does not render the claimed embodiment of the invention obvious. Because Claim 13 depends from and includes every element of an allowable independent claim, Applicants respectfully request the Examiner to reconsider and withdraw the § 103 rejection of Claim 13.

The Examiner rejects Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49 under 35 U.S.C. §103(a) as being unpatentable over *Korpela* in view U.S. Patent 6,426,963 which issued to Kim (“*Kim*”). Applicants respectfully traverse and submit the cited art combinations, even if proper, which Applicants do not concede, does not render the claimed

embodiment of the invention obvious. Each of these claims depend from an independent claim shown above to be patentable over *Korpela*. The introduction of *Kim* fails to provide the elements of Applicants' independent claims not shown by *Korpela*. Therefore, Applicants respectfully request the Examiner to reconsider and withdraw the § 103 rejection of Claims 4, 5, 9, 11, 16, 22, 23, 31, 32, 38-40, 43, and 49.

**CONCLUSION**

Applicants have made an earnest attempt to place the Application in condition for allowance. For the foregoing reasons, and for other reasons clearly apparent, Applicants respectfully request full allowance of all pending claims. If the Examiner feels that a telephone conference or an interview would advance prosecution of the Application in any manner, the undersigned attorney for Applicants stands ready to conduct such a conference at the convenience of the Examiner.

Although no fees are believed to be currently due, the Commissioner is hereby authorized to charge any fees or credit any overpayments to Deposit Account No. 02-0384 of BAKER BOTTS L.L.P.

Respectfully submitted,

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Date: March 4, 2004

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